

From: [Hill, Coleen W.](#)
To: [David J. Stanoch](#); ["DECValsartan@btlaw.com"](mailto:DECValsartan@btlaw.com)
Cc: [Valsartan PEC](#); [Geman, Rachel](#); [Nicholas Migliaccio](#); Ghansel@preti.com; [Goldberg, Seth A.](#)
Subject: [EXTERNAL]RE: Valsartan -- Deposition Dates for Additional Defense Class Experts
Date: Monday, January 31, 2022 9:30:12 PM

Dear Counsel,

Below you will find dates of availability and locations for the limited depositions of Drs. Bottorff, Britt, Chodosh, and Flack. Please confirm prior to this week's CMC that these depositions will be limited to questioning regarding the experts' newly-disclosed opinions addressing class certification. Obviously, Defendants would object to any effort to re-plow ground already covered with these experts in this litigation, including but not limited to questioning on background, qualifications, general causation opinions, and any other items that were covered in Plaintiffs' prior deposition of these experts.

Please confirm that this agenda item can be removed from the CMC submissions. If there is more to discuss, please let us know as soon as possible so that we can meet and confer in advance of the CMC.

- **Dr. Bottorff:** March 1 (Knoxville, TN)
- **Dr. Britt:** March 8 (Duane Morris, 1875 NW Corporate Boulevard, Suite 300, Boca Raton, FL 33431-8561)
- **Dr. Chodosh:** March 10 (Greenberg Traurig, 1717 Arch Street, Suite 400, Philadelphia, PA 19103)
- **Dr. Flack:** March 8 (Springfield, IL) (Dr. Flack is available beginning at 1 p.m.)

Regards,
Coleen

Coleen W. Hill

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From: David J. Stanoch <d.stanoch@kanner-law.com>
Sent: Tuesday, January 25, 2022 3:09 PM
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Cc: Valsartan PEC <valpec@kirtlandpackard.com>; Geman, Rachel <rgeman@lchb.com>; Nicholas Migliaccio <nmigliaccio@classlawdc.com>; Ghansel@preti.com
Subject: [EXTERNAL]Valsartan -- Deposition Dates for Additional Defense Class Experts

Dear Counsel,

Defendants did not provide deposition dates for the following defense experts who submitted class certification reports dated January 12, 2022. Please provide deposition dates and locations for these witnesses promptly:

- Michael Bottorff
- Janice Britt
- Lewis Chodosh
- John Flack

Please note that, in requesting deposition dates for these defense experts, Plaintiffs do not waive any rights or arguments as to the admissibility of these experts' reports or opinions – including but not limited to these experts' offering untimely new or supplemental general causation opinions.

Regards,

Dave

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